

March 5, 2012

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, DC 20554

Re: Applications of Cellco Partnership d/b/a/ Verizon Wireless, SpectrumCo, LLC,

and Cox TMI Wireless, LLC for Consent to Assign Wireless Licenses, WT Docket

No. 12-4

Dear Ms. Dortch:

This is to inform you that on March 1, 2012, Stacy Fuller and undersigned counsel on behalf of DIRECTV, LLC had a telephone conversation related to the above referenced proceeding with Austin Schlick, Commission General Counsel, and Sarah Whitesell, Deputy Chief of the Commission's Media Bureau. The discussion focused on the need for the Applicants to supply complete and non-redacted copies of their commercial arrangements for assessment by interested parties under the safeguards of the Protective Orders that have been put in place for this proceeding. The DIRECTV representatives argued that, although the Commission may gain access to the redacted materials through submissions made to the Department of Justice, private parties would have no such opportunity. The Commission would then be in a position of making determinations about the relevance and significance of materials not in the record, which could run afoul of the Administrative Procedure Act. More importantly, private parties may have unique insights into the practical and competitive effects of the redacted terms, which would be denied to the Commission if those terms are not made part of the confidential record. Lastly, the Commission must consider the precedent that would be set if it allows any applicant to make unilateral determinations that certain information is not relevant to a proceeding or that Commission-imposed protective orders are not sufficient to safeguard confidential information.

Sincerely yours,

/s/

William M. Wiltshire Counsel for DIRECT, LLC

ce: Austin Schlick Sarah Whitesell